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FREESCALE SEMICONDUCTOR, INC.

12 | FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

18 | MEDIATEK INC.,

Civil Action No. 4:11-cv-05341 (YGR)

Plaintiff,

20 || v.

**DECLARATION OF MARK PATRICK
IN SUPPORT OF MEDIATEK INC.'S
STIPULATED ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL, DOCKET NO. 334**

21 FREESCALE SEMICONDUCTOR, INC.

Defendant.

1 I, Mark Patrick, declare as follows:

2 1. I am Law Director, Intellectual Property for Freescale Semiconductor, Inc.
3 (Freescale). I submit this declaration in support of MediaTek's Stipulated Administrative Motion
4 to File Documents Under Seal (Motion to Seal), Dkt. No. 334, pursuant to Local Rules 7-11 and
5 79-5. I have personal knowledge of the facts set forth in this declaration and, if called to testify as
6 a witness, could and would do so competently.

7 2. **Technical Information Concerning Function and Operation of Freescale**
8 **Products.** MediaTek seeks to file under seal MediaTek's Opposition to Freescale
9 Semiconductor, Inc.'s Motion for Adverse Inferences (MediaTek's Opposition) (Dkt. No. 334-6)
10 and Exhibit 7 to Hammon Declaration in Support of MediaTek's Opposition, Excerpts of
11 MXC91131 Baseband Processor IC Reference Manual (Dkt. No. 334-21).

12 3. Attached as Exhibit A to this declaration is the version of MediaTek's Opposition
13 with Freescale's proposed redactions highlighted in yellow. Attached as Exhibit B to this
14 declaration is the entirety of Exhibit 7 to Hammon Declaration in Support of MediaTek's
15 Opposition, Excerpts of MXC91131 Baseband Processor IC Reference Manual. The identified
16 portions of Exhibit A and the entirety of Exhibit B discuss highly confidential proprietary
17 information on the technical features of Freescale's accused products, including specific signals,
18 signal type, and signal descriptions, derived from a document that Freescale had stamped as
19 "Highly Confidential – Attorneys' Eyes Only" before producing to MediaTek. Disclosure of the
20 confidential information from Exhibits A and B would significantly harm Freescale by allowing
21 its competitors to learn detailed information on the function and operation of the accused product
22 families, including the identity, type, and description of specific signals on the accused products
23 and the function or behavior of particular signals, such that they may appropriate Freescale's
24 proprietary technology. The requested relief is necessary and narrowly tailored to protect the
25 confidentiality of this information. Accordingly, Freescale requests that the Court seal
26 MediaTek's Opposition and Exhibit 7 to Hammon Declaration in Support of MediaTek's
27 Opposition.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed this 26th day of November, 2013, at Austin, Texas.

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4 Mark Patrick

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